



I oppose plan confirmation because the **Debtor has failed to:**

- ☐ schedule debts within the limits of 11 USC §109(e); and therefore **ineligible**; and/or Debtor is not eligible to be a Chapter 13 Debtor as follows:
- ☒ **disclose** [11 USC §521, LBR 1017-1(b)]  
☒ assets ☐ creditors ☒ income ☐ prior case  
- **File declaration w/ court explaining ownership of Reseda property, attach all evid. to declaration [pre-nup rec'd]**  
- **[according to Sch.J, debtor contributes community funds to the spouse's mortgage payment for the alleged separate prop., debtor also paid \$23K down payment for the prop.]**  
- **Must remain 100% due to liquidation**  
- **spouse's income not disclosed**
- ☐ **serve all** creditors with notice and the Plan at least 28 days before the 11 USC §341 (a) Meeting of Creditors, FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);
- ☒ provide the Trustee **documentation of all income** (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521;  
- **2013 tax return for spouse**  
- **current paystub - spouse**  
- **pension**
- ☐ meet the **business reporting requirements** regarding Debtor's business or self-employment, LBR 3015-1(c)(4);
- ☒ provide to the Trustee completed copies of the Federal and State **income tax returns**, 11 USC § 1308 and 521, LBR 3015-1(c)(3).  
- **2013 tax return for spouse**
- ☐ propose a plan that is feasible 11 USC § 1325(a)(6); the plan is **infeasible** because  
☐ certain claims are not included and/or the amount provided is insufficient  
☐ income is not sufficient enough to fund it  
☐ plan payment will not retire debt within term  
☐ the plan does not propose treatment and/or properly treat all scheduled, priority and/or secured creditors; and/or plan deficiencies as follows:
- ☐ propose a plan that represents the Debtor's **best effort** 11 USC §1322; 11 USC §1325  
☐ unreasonable and/or unnecessary expenses are scheduled  
☐ the budget surplus exceeds the monthly plan payment  
☐ comply with the Means Test as required by the Code, In re Kagenveama, 541 F3d 868, and/or In re Lanning, 1330 S.Ct.2464
- ☐ propose a plan that provides creditors as much as would be received under **Chapter 7** 11 USC §1325(a)(4).

☒ other issues as stated below:

- **Trustee to request interlineations that all tax returns be submitted to the Trustee; all tax refunds to be submitted into the plan and the Debtor will not incur debt greater than \$500 without Court permission.**
- **Debtor improperly attempting to exempt future tax refunds, if exempting 2013 refunds, amend to specify**

## PROOF OF SERVICE

**In Re: Anthony Ray Russo**  
**Case No. SV14-13644-AA**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Elizabeth Rojas  
15060 Ventura Blvd.  
Suite 240  
Sherman Oaks, CA 91403

The foregoing document described as **TRUSTEE'S OBJECTION TO CONFIRMATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION** will be served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

On September 24, 2014, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Anthony Ray Russo  
7447 Newcastle  
Reseda, CA 91335

Brett F Bodie  
Bankruptcy Law Center, APC  
16133 Ventura Blvd #700  
Encino, CA 91436

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: September 24, 2014

/s/ Patricia Trujillo

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